



**Karen Nations**

**Senior Attorney**

Direct Dial: (201) 531-8053

Fax: (201) 531-2803

E-mail: knations@mfn.com

May 22, 2000

**VIA AIRBORNE EXPRESS**

David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: In the Matter of Application of Metromedia Fiber Network Services, Inc., for a Certificate to Provide Competing Local and Interexchange Telecommunications Services, Docket No. 00-00233

Dear Mr. Waddell:

Enclosed are 15 copies of response to an information request dated May 12, 2000 in the above matter. Please file 14 copies and return the additional copy to me marked "filed" in the enclosed envelope.

Please contact me if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Karen Nations".

Karen Nations

Enclosure  
SASE  
CC: Darrell Whitis

## **INFORMATION REQUEST**

### **METROMEDIA FIBER NETWORK SERVICES, INC. (00-00233)**

#### **Numbering Issues**

Please provide answers to the following questions concerning numbering within your proposed service area.

1. What is your company's expected demand for NXXs per NPA within a year of approval of your application?

**A: MFNS will initially offer non-switched services and will not require any numbering resources within a year of approval of its application.**

2. How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?

**A: MFNS estimates it will not request any NXXs from NANPA when its service footprint is established.**

3. When and in what NPA do you expect to establish your service footprint?

**A: Construction will begin in Nashville (615).**

4. Will the company sequentially assign telephone numbers within NXXs?

**A: N/A**

5. What measures does the company intend to take to conserve Tennessee numbering resources?

**A: MFNS does not intend to use Tennessee numbering resources.**

6. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?

**A: N/A**

### **Tennessee Specific Operational Issues**

Please provide answers to the following questions concerning Tennessee Specific Operational Issues.

1. How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.

**A: MFNS will not provide switched telecommunications services, therefore, TCA §65-21-114 does not apply.**

2. Is the company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers on the database?

**A: MFNS will provide non-switched telecommunications services and will not assign telephone numbers to its customers that must be loaded in the database maintained by BellSouth.**

3. How does your company intend to provide metro area toll-free calling ("MAC") around Memphis, Nashville, Knoxville, and Chattanooga?

**A: MFNS will provide non-switched telecommunications services and will not provide metro area toll-free calling within the state.**

4. Is the company aware of the MAC database maintained by BellSouth and the procedures to enter your telephone numbers on the database?

**A: MFNS will provide non-switched telecommunications services and will not assign telephone numbers to its customers that must be loaded in the database maintained by BellSouth.**

5. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TRA on resolving customer complaints.

**A: The TRA may contact Karen Nations at 201-531-8053 on resolving customer complaints.**

6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 *et seq.* and Chapter 1220-4-11?

**A: MFNS does not intend to telemarket its services.**

**Financial Requirements:**

F. TCA §65-4-125 amendment states that by September 1, 2000, all telecommunications service providers subject to the control and jurisdiction of the authority, except those owners or operators of public telephone service who pay annual inspection and supervision fees pursuant to Tennessee Code Annotated, §65-4-301(b), or any telecommunications service provider that owns and operates equipment facilities in Tennessee with a value of more than five million (\$5,000,000), shall file with the authority a corporate surety bond or irrevocable letter of credit in the amount of twenty thousand dollars (\$20,000) to secure the payment of any monetary sanction imposed in any enforcement proceeding, brought under this title or the Consumer Telemarketing Protection Act of 1990, by or on behalf of the authority.

**A: MFNS will provide the require bond to the Authority when it becomes due.**